IN THE SUPREME COURT OF MISSISSIPPI

FORD MOTOR COMPANY

PETITIONER/DEFENDANT

VS.

CASE NO.: 2014-M-01822-SCT

GEORGE SULLIVAN AND WIFE, LYDA SULLIVAN; MELVIN WILSON; PAUL CRAFT; AND ROBIN ROBINSON

RESPONDENTS/PLAINTIFFS

MOTION TO WITHDRAW AS COUNSEL

COME NOW Richard M. Dye, Kathleen E. Ingram, and the law firm of Butler Snow LLP ("Movants"), and respectfully request that the Court enter an order allowing them to withdraw as counsel of record for the Defendant Ford Motor Company ("Ford"). In support thereof, Movants would show the Court the following:

- 1. This is a consumer warranty case against Ford. Movants are presently serving as counsel for Ford in this matter.
- 2. A conflict of interest has arisen between Movants and Ford that precludes Movants from continuing to represent Ford.
- 3. The withdrawal of Movants will not prejudice Ford given the current status of this appeal: the parties await this Court's resolution of Ford's petition for interlocutory appeal.
- 4. To the extent that the Court requires additional information related to the details of the conflict of interest, Movants will provide that information to the Court for the Court's in camera review.

WHEREFORE, PREMISES CONSIDERED, Richard M. Dye, Kathleen E. Ingram, and the law firm of Butler Snow LLP respectfully request that they be allowed to withdraw as counsel of record for Ford and that Ford be granted twenty (20) days to retain new counsel for this matter.

Respectfully submitted.

BUTLER SNOW LLP, RICHARD M. DYE, AND KATHLEEN E. INGRAM

/s/ Kathleen E. Ingram

Richard M. Dye (MB # 99417) Kathleen E. Ingram (MB # 104220)

1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010

Phone: 601.948.5711 Fax: 601.985.4500

Email: rick.dye@butlersnow.com
Email: kat.carrington@butlersnow.com

CERTIFICATE OF SERVICE

I, Kathleen E. Ingram, one of the attorneys for Ford Motor Company, do hereby certify that I have this day caused to be served a true and correct copy of the above and foregoing document by filing it using the ECF system which sent notice to the following counsel of record:

Eugene C. Tullos Post Office Box 74 Raleigh, Mississippi 39153

ATTORNEY FOR PLAINTIFFS

SO CERTIFIED, this the 17th day of February, 2015.

<u>/s/ Kathleen E. Ingram</u>

KATHLEEN E. INGRAM